

Triethylene glycol dibenzoate - Comments of Environmental Defense

(Submitted via Internet 4/25/02)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Triethylene glycol dibenzoate, CASRN 120-56-9.

We compliment Velsicol Chemical Corp. on preparing a complete and thorough summary of data describing the environmental fate and toxicity of triethylene glycol dibenzoate. We concur in the sponsor's conclusion that no additional testing is needed pursuant to the HPV program, inasmuch as adequate data for all SIDS endpoints are already available.

We are also appreciative of the fact that the summary briefly describes the primary uses of this chemical. Uses described indicate that exposure to the general public will be minimal. Data described in this report indicate that triethylene glycol dibenzoate degrades rapidly in the environment, has low toxicity to fish and mammals and is not genotoxic. Thus, based on information now available, it appears that any triethylene glycol dibenzoate released into the environment in quantities less than those anticipated with a spill should degrade rapidly and pose little risk to environmental or human health.

Thank you for this opportunity to comment.

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